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ex rel. its Department of Corrections and
Perry Russell*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RON SCHRECKENGOST, an individual,
and ELIZABETH WALSH, an individual,

Plaintiffs,

v.

THE STATE OF NEVADA, *ex rel.* the
NEVADA DEPARTMENT OF
CORRECTIONS, and PERRY RUSSELL,
an individual,

Defendants.

Case No. 3:19-cv-00659-MMD-CLB

**STIPULATION, REQUEST, AND
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFFS' SECOND AMENDED
COMPLAINT**

(FIRST REQUEST)

Defendants, STATE OF NEVADA *ex rel.* its DEPARTMENT OF CORRECTIONS (“NDOC”) and PERRY RUSSELL (“Russell”), by and through their attorneys, AARON D. FORD, Attorney General for the State of Nevada, BRANDON R. PRICE, Senior Deputy Attorney General, and SCOTT H. HUSBANDS, Deputy Attorney General, pursuant to LR IA 6-1, LR IA 6-2, hereby submit their Stipulation, Request, and Order Extending Time to Answer or Otherwise Respond to Plaintiffs’ Second Amended Complaint. This is the first request for an extension of time to file an answer or otherwise respond to Plaintiffs’ Second Amended Complaint.

1 Plaintiffs, RON SCHRECKENGOST and ELIZABETH WALSH (collectively
2 “Plaintiffs”), filed their Second Amended Complaint (ECF No. 66) on September 24, 2020.
3 Pursuant to Federal Rule of Civil Procedure 15(a)(3), the deadline for Defendants to answer or
4 otherwise respond to the First Amended Complaint is October 8, 2020.

5 Due to pre-existing professional obligations, the need for defense counsel to assist with
6 child care at home due to recent preschool closures as a result of COVID-19 and fall break, and
7 previously scheduled vacations during the week of October 5, 2020, to October 9, 2020,
8 Defendants need additional time to prepare a responsive pleading or otherwise respond by
9 motion to Plaintiffs’ Second Amended Complaint.

10 Upon agreement by and between all the parties, through their respective counsel, the
11 undersigned counsel requests that this Court grant Defendants an 8-day extension of time, up to
12 and including, October 16, 2020, to file an answer or otherwise respond by motion to Plaintiffs’
13 Second Amended Complaint.

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1 By entering into this stipulation, none of the parties waive any rights they have under statute,
2 law, or rule with respect to Plaintiffs' Second Amended Complaint.

3 DATED: October 2, 2020

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5 AARON D. FORD
Attorney General

THE GEDDES LAW FIRM, P.C.

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7 By: /s/ Brandon Price
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and Elizabeth Walsh

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18 **ORDER**

19 IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE

22 Dated: October 2, 2020
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